

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BANK OF AMERICA, N.A., a North Carolina corporation,)	
)	
)	
Plaintiff,)	Case No. 12-cv-07480
)	
v.)	Honorable Sharon Johnson Coleman
)	
CHI CHING YANG, an individual, ANGELA CHIANG, an individual,)	Magistrate Judge Sheila M. Finnegan
)	
)	
Defendants.)	

**NOTICE OF AGREEMENT ON ATTORNEYS' FEES AND COSTS AND PLAINTIFF'S
MOTION FOR ENTRY OF FINAL JUDGMENT**

Plaintiff, Redstone Funding, LLC ("Plaintiff"), by its attorneys, Leonard S. Shifflett and Steven V. Hunter of Quarles & Brady LLP, moves this Court to enter final judgment against Defendants, Chi Ching Yang and Angela Chiang (collectively the "Defendants"), jointly and severally, in the total amount of **\$4,325,903.64**. In support of its Motion, Plaintiff states as follows:

1. Pursuant to Local Rule 54.3, Defendants have agreed to pay (and Plaintiff has agreed to accept) \$50,000 as payment for all attorneys' fees and costs associated with the instant case.

2. In light of the Parties' agreement to accept \$50,000, this Court's May 27, 2014 finding that Defendants defaulted on their Guarantees (Doc. 35) and the express language of the CAKK Loan Documents and CAKK Guarantees, Defendants are responsible to pay Plaintiff the following amounts that were due and owing as of June 11, 2014:

a.	\$4,228,458.90	principal
b.	\$41,414.65	late fees
c.	\$6,030.09	interest
d.	\$50,000	attorneys fees and costs

\$4,325,903.64 Total

WHEREFORE, Plaintiff prays for entry of a \$4,325,903.64 judgment in its favor and against Chi Ching Yang and Angela Chiang.

Dated: July 16, 2014

Respectfully submitted,
Redstone Funding, LLC

By: /s/ Steven V. Hunter
One of Its Attorneys

Leonard S. Shifflett (ARDC #2587432)
Steven V. Hunter (ARDC #6277695)
QUARLES & BRADY LLP
300 North LaSalle Street, Suite 4000
Chicago, IL 60654
(312) 715-5000 – Telephone
(312) 715-5155 – Facsimile